UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff;
v.
COMMONWEALTH OF PUERTO RICO, ET AL.,
Defendants.

No. 12-cv-2039 (GAG)

MOTION TO FILE JOINT STIPULATION IN RESTRICTED MODE

COMES NOW, Plaintiff, the United States of America, by and through the undersigned counsel, and respectfully requests leave to file the Parties' Joint Stipulation Effectuating the Participation of the Special Master ("Joint Stipulation") in restricted mode for viewing by the Court and the Parties. For cause, the United States respectfully states and alleges:

1. The Parties, with the concurrence of the Special Master, have agreed on measures that are designed to facilitate the Special Master's participation in the reform process, in accordance with the Court's Orders and the Agreement for the Sustainable Reform of the Puerto Rico Police Bureau, Doc. 60.

2. As instructed by the Court, the United States intends to file the Joint Stipulation in restricted mode for viewing by the Court and the Parties.

WHEREFORE, the United States respectfully requests leave to file the Joint Stipulation in restricted mode.

Respectfully submitted, this 15th day of March, 2019,

STEVEN H. ROSENBAUM
Chief, Special Litigation Section
Civil Rights Division

s/Luis E. Saucedo
TIMOTHY D. MYGATT
Deputy Chief
LUIS E. SAUCEDO (G01613)
Counselor to the Chief & Senior Trial Attorney
JORGE CASTILLO (G02912)
Trial Attorney
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Avenue, NW
Washington, DC 20530
Tel: (202) 598-0482
Fax: (202) 514-4883
luis.e.saucedo@usdoj.gov
jorge.castillo@usdoj.gov

Attorneys for the United States

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th of March, 2019, I filed the foregoing pleading electronically through the CM/ECF system, which caused the parties, counsel of record and the Monitor on the service list to be served by electronic means.

s/Luis E. Saucedo
LUIS E. SAUCEDO (G01613)
Counselor to the Chief